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February 3, 2020

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By ECF Filing

The Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: United States v. Michael L. Cohen, 17 CR 544 (NGG)

Dear Judge Garaufis:

We represent defendant Michael Cohen in connection with the above-referenced case. This letter is submitted to request that the Court issue an order exonerating Mr. Cohen's bail conditions and directing the Court Clerk and the government to take the steps necessary to effectuate release of the cash and real property posted to secure the bail. The government has no objection to this request.

On November 19, 2019, the Court sentenced Mr. Cohen to three months incarceration. He self-surrendered to the institution designated by the Bureau of Prisons on January 29, 2020 and is currently serving his sentence. He previously paid both the fine and special assessment imposed by the Court in a timely fashion.

Mr. Cohen's bail was secured by (1) \$500,000 in cash posted by Mr. Cohen and deposited with the Clerk of the Court; (2) his parents' home in Maine; and (3) his wife's property in St. Croix, U.S. Virgin Islands. As part of the bail package, the two real properties were encumbered by liens in favor of the United States, in the form of a "Deed of Trust" on the Maine property and a "Bail Lien" on the Virgin Islands property.

We respectfully request that the Court order that (1) Mr. Cohen's bail conditions be exonerated and that Mr. Cohen and all suretors be released of all obligations under the bond; (2) the Clerk of the Court return the \$500,000 deposited with the Court to Mr. Cohen, care of his counsel, Ronald G. White, Morrison & Foerster LLP, 250 West 55th Street, New York, NY 10019; and (3) the government execute the appropriate documentation (which will be prepared by defense counsel) to release the Deed of Trust and Bail Lien in favor of the United States placed upon the Maine and Virgin Islands properties. As noted above, we have

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advised the prosecutors handling this case of this request, and the government has no objection to the request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ronald G. White". The signature is fluid and cursive, with the first name "Ronald" being more prominent.

Ronald G. White

cc: Government counsel (by ECF)